



From the desk of:
James M. Kramer, Esq.

January 13, 2023

VIA ECF

Hon. Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re. *Gref v. Am. Int'l Indus., et al.*, 20-cv-05589

Dear Judge Figueredo,

Plaintiff writes in accord with the Court's directive that the parties provide a joint update on the status of the expert deposition schedule in this matter.

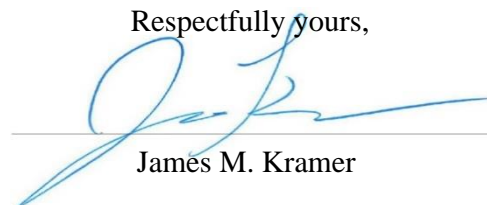
With respect to Plaintiff's expert, Dr. William Longo, Plaintiff had requested a date as soon as possible this month for his continued deposition. He unfortunately has no availability in January, but can be available for deposition on Friday, February 3, his next soonest available date. Plaintiff has communicated this to counsel for Defendants, who have confirmed that they will be noticing the deposition.

Regarding Defendant American International Industries' expert, Dr. Allan Feingold, AII has offered Dr. Feingold for his continuation deposition on January 18, 2023 from 1:00 p.m. to 5:00 p.m. (ET) and January 19, 2023 from 1:00 p.m. to 2:00 p.m. (ET). This morning, AII also offered Mickey Gunter for deposition on February 16, 2023 at 12:00 p.m. (ET), and Alan Segrave on February 21, 2023 at 9:00 a.m. (ET). AII advised Plaintiff that both Mr. Gunter's and Mr. Segrave's depositions are subject to the completion of Dr. Longo's deposition.

Plaintiff currently awaits deposition dates from Defendants for the remaining defense experts.

As always, we stand ready to provide additional information or answer any questions the Court may have.

Respectfully yours,



James M. Kramer

cc: All Counsel of Record (via ECF)

We stand for our clients.

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